



## Independent Bankers Association of Texas

April 10, 2018

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*Via email: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)*

RE: Docket No. R-1599; RIN 7100-AE98  
Collection of Checks and Other Items by Federal Reserve Banks  
and Funds Transfers through Fedwire

Dear Ms. Misback:

The following comments are submitted on behalf of the Independent Bankers Association of Texas ("IBAT"), a trade association representing nearly 400 independent, community banks domiciled in Texas.

We appreciate efforts to align Regulation J with the 2017 amendments to Regulation CC (Availability of Funds and Collections of Checks). These amendments are necessary to clarify and simplify certain provisions of Regulation J that no longer align with Regulation CC and cause both confusion and concern for community bankers.

Additionally, the proposed amendments clarify that the usage of any term in the financial messaging standard does not confer or connote any specific legal status and—more importantly—implied responsibilities for community bankers.

Thank you for the opportunity to submit these comments on behalf of Texas community bankers who wholeheartedly support these amendments.

Sincerely,

Christopher L. Williston, CAE  
President and CEO